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Marlene H. Dortch, Secretary Federal Communications Commission RE: GN Docket No. 12-354, RM-11778 and RM-11789

The purpose of this letter is to formally **oppose** the CTIA and T-Mobile petitions put forth in the above stated docket.

Celerity Broadband LLC (formerly MN Wireless LLC) is a rural, fixed-wireless Internet service provider, serving rural customers in central and eastern South Dakota. Started in 2006, Celerity Broadband LLC serves nearly 2300 customers throughout the eastern half of South Dakota. We provide the following download speed packages to nearly all customers:

8 Mbps 16 Mbps 25 Mbps

Upload speeds are 8 Mbps for all plans except those based on LTE, in which case the upload speeds are 2 Mbps.

Our company has been investing in the 3650-3700 Mhz band for many years, obtaining an NN license early on. We continue to deploy equipment in this band, anticipating the final adoption of the fair rules adopted in 2015 establishing the current proposed use of the 3550-3700 MHz band. We have been an early adopter of the 3650-3700 MHz band for use with LTE deployments, which has increased our reach to previously unserved and underserved consumers. The momentum already underway for the proposed 2015 rules for the 3550-3700 band is meaningful to us as we have deployed equipment that is capable of abiding by all the CBRS band rules as anticipated today. This 100 MHz of new spectrum should not be restructured to be merely for the benefit of the "big 3" cellular carriers, when it is rural WISPs which have brought affordable, high quality, high speed Internet to rural consumers. Rural WISPs invest local money, in local communities, to provide a service to local consumers they cannot obtain from any large wireless carrier. Only by using the CBRS band as proposed in the 2015 rules will the rural consumer win and continue to enjoy affordable access to truly affordable, high-speed Internet.

Again, Celerity Broadband LLC is opposed to the CTIA and T-Mobile petitions to modify the structure of the CBRS band in a way that is clearly only beneficial to large carriers and not the end-customer.

Jesse DuPont, Partner

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